



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**ELECTRONIC MAIL AND**  
**CERTIFIED MAIL WITH RETURN RECEIPT**

January 16, 2013

Mr. Derek W. Tomlinson, P.E., P. Eng.  
Project Coordinator  
Geosyntec Consultants, Inc.  
1787 Sentry Parkway West  
Building 18, Suite 120  
Blue Bell, PA 19422

RE: North Penn 5 Superfund Site, Operable Unit 2  
Remedial Design Work Plan (RDWP), dated November 29, 2012, as required by  
Administrative Order (Docket No. CERCLA-03-2012-0205DC)

Dear Mr. Tomlinson:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the subject document. The RDWP is considered approved provided that the attached comments are addressed sufficiently in a final version of the document. According to Paragraph 25.c.3, "Upon approval by EPA, the RA Work Plan shall be deemed to be incorporated into this Order and made enforceable part hereof."

Please resubmit the final RDWP within fourteen (14) days of the date of this letter per Paragraph 67 of this Order. To expedite review of the revised document, please submit responses to our comments and a redlined electronic version of the RDWP along with the revised final RDWP.

If you have any questions, please contact me at 215-814-3018.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Fang", is written over the typed name Sharon Fang.

Sharon Fang, P.E.  
Remedial Project Manager

Attachment

cc: Tim Cherry, PADEP  
**Ex. 4 - CBI**, HGL  
Allison Gardner, EPA  
File

**Comments on the Remedial Design Work Plan, dated November 29, 2012**  
**North Penn 5 Site, Operable Unit 2**

1. **General Order Requirement Paragraph 63:** The RDWP must contain the certification and signature.
2. **Page 1, second paragraph:** Bioaugmentation is the remedy selected in the 2011 ROD. Delete the last portion of the last sentence “or commonly referred to as enhanced in situ bioremediation.” Also, modify the acronyms list so EISB is only Enhanced In-situ Bioaugmentation.
3. **Page 3, Remedial Design Team, second bullet:** Revise the last sentence as “Hydrogeologic, Inc in Philadelphia, Pennsylvania will serve as the USEPA RD Oversight Contractor. Also, change Figure 4 accordingly.
4. **Page 6, Layout and Setting, first paragraph:** Revise second sentence to include the italicized wording: “NP5 encompasses an approximately five square-mile area generally bounded by Richardson Road to the southeast, Bethlehem Pike (Route 309) to the west, Trewigtown Road to the northwest and Schoolhouse Road *to the east* (Figure 2).
5. **Page 10, Historic Site Conditions, third paragraph, last sentence:** Delete “USEPA has stated that.”
6. **Page 12, Section 3.1:** Section references chemicals of potential concern (COPCs). Please revise to chemicals of concern (COCs) throughout the document.
7. **Page 17, Pre-Design Investigation Work Plan:** State that FSP will include a survey of all new sampling locations and verify existing well locations by a licensed surveyor.
8. **Page 18, last bullet and Page 23, second bullet:** Says a Contingency Plan is not required/necessary. A Spill Pollution, Control and Countermeasure (SPCC) Plan should be developed for the RD (due in 30% design) and updated for the RA (due in 90% & 100% designs). Air Monitoring is typically part of the Contingency Plan. If a Contingency Plan is not produced, ensure this topic is covered in another deliverable and referenced the Contingency Plan bullets in the RDWP.
9. **Page 21, first line continued from the previous page:** Delete “if deemed necessary.” EPA expects geophysical and packer testing of bedrock wells to include such testing.
10. **Page 21, Preliminary Construction/Remedial Action Schedule and Page 22, Pre-final... Schedule:** Include critical path as an item that will be presented on all schedules including Figure 5 RD Implementation Schedule.
11. **Page 23, Permitting Requirements Plan:** This plan shall also discuss any activities that requires permits, i.e. activities that are not conducted entirely on-site.
12. **Figure 5:** Replace this schedule with the schedule submitted on January 15, 2013. Add footnote for edays and delete “if available”/“if not provided” language.